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January 23, 2009

BY ELECTRONIC MAIL

Ms. Carole Davis
Co-Executive Secretary
Dietary Guidelines Advisory Committee
Center for Nutrition Policy and Promotion
U.S. Department of Agriculture
3101 Park Center Drive, Room 1034
Alexandria, VA 22302

Dear Ms. Davis:

We are pleased to submit the following comments regarding the development of the Dietary Guidelines for Americans, 2010 on behalf of our client, the American Fruit and Vegetable Processors and Growers Coalition. A current membership list of the coalition is enclosed.

The American Fruit and Vegetable Processors and Growers Coalition (AFVPGC) is a national organization representing family farm growers of fruits and vegetables that are grown for processing, and the suppliers and the food processors who prepare those products for retail distribution and sale.

First and foremost, we appreciate the recommendations contained in the Dietary Guidelines for Americans, 2005. That document stated we should eat a variety of fruits – “whether fresh, frozen, canned, or dried.” We urge you to maintain this recommendation as part of Dietary Guidelines for Americans, 2010. More than 90 percent of consumers currently eat less than the recommended amount of fruits and vegetables. For the past 40 years, consumers have been told to eat more fruits and vegetables. We agree, and suggest that there is no single approach (i.e. fresh versus frozen, canned, or dried) that will guarantee the accomplishment of this goal.

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According to a report issued by the Economic Research Service of the U.S. Department of Agriculture in April 2006, more than 50 percent of all fruits and vegetables grown in the United States are processed.

Processed fruits and vegetables are nutritionally equivalent to fresh fruits and vegetables.

Most importantly, in some cases processed products are nutritionally equivalent or superior to fresh product. The respected American Dietetic Association makes this point:

- The American Dietetic Association's *Complete Food and Nutrition Guide* says "Research shows that canned and frozen ingredients are as nutritious as fresh sometimes even more so."
- The American Dietetic Association in its publication *Shopping Solutions for Healthy Eating* pointed out: "Canned fruits and vegetables are great to have on hand because they are similar and sometimes higher in nutrients than their fresh counterparts-and they don't spoil as quickly!"

The Produce for Better Health Foundation's new "Fruits and Veggies – More Matters" campaign encourages the consumption of all forms of fruits and vegetables: fresh, frozen, canned, and dried.

USDA has a strong record of purchasing nutritionally equivalent or superior processed fruits and vegetables for use in all nutrition assistance programs, including school lunch, school breakfast, as well as including processed product as a WIC eligible item. We appreciate this support of our industry, and we stand ready to increase the available supply of processed fruits and vegetables for all of these programs.

Processed fruits and vegetables offer several additional advantages.

Processed fruits and vegetables offer several advantages in addition to their nutritional equivalency.

Canned and frozen fruits and vegetables are often a better value. They have a lower cost per serving, and by their very nature have a longer shelf life. Canned and frozen product is easily portioned, with the remaining product available for use at a later time. The problem of spoilage, intrinsic in fresh product, is never a problem for appropriately stored canned and frozen fruits and vegetables. Given that they are picked and processed at their peak of freshness, they provide a more consistent quality that encourages consumption.

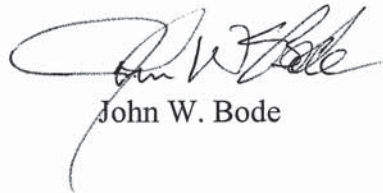
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Canned and frozen fruits and vegetables offer enhanced food safety. Processed product undergoes stringent and consistent food safety protocols to ensure only the safest product is provided to our consumers. The technology used in our industry to enhance food safety is second to none.

America's processors provide jobs and other important support to local economies throughout the nation. We provide support for family farmers who depend upon an effective and sustainable processing industry for their production. America's fruit and vegetable processors and growers want to work with you to ensure greater consumption of fruits and vegetables in all forms, and to continue to provide jobs in American communities.

Again, we extend our appreciation for your having provided this opportunity for AFVPGC to offer comments on this important matter.

Sincerely,

A handwritten signature in black ink, appearing to read "John W. Bode", with a long, sweeping underline that extends below the printed name.

John W. Bode

Enclosure
JWB:mhh

Enclosure
American Fruit and Vegetable Processors and Growers Coalition
Membership as of January 23, 2009

FOOD PROCESSING

Allen's Canning, AR
Beckman Gast Canning, IN
Birdseye Foods, NY
Cabbage, Inc., OH
Campbell Soup Co., NJ
Faribault Foods, MN
Furman Foods, PA
Fremont Company, OH
Heinz North America
Hirzel Canning, OH
Lakeside Foods, WI
Lodi Canning, WI
Nestle' USA
Oliver Winery, IN
Ray Brothers & Noble Canning, IN
Red Gold, Inc., IN
S.E.W. Friel, MD
Seneca Foods, WI
Sechler's Pickles, IN
Tip Top Canning, OH

SUPPLY INDUSTRY MEMBERS

Cerexagri
Great Lakes Food Machinery
McDonnall Harvester
Purdue University
Silgan Corporation
Ball Corporation

GROWERS

Abbett Farms, IN
AcMoody Farms, IN
Albright Farms, MI
Associated Growers, IN
Bainter Farms, IL
Birky Farms, IN
Boring Farms, IN
Busch Farms, OH
Carnahan Farms, IN
Cox Farms, Inc., IN

Daily Farms, IN
Detling Farms, OH
Detling Farms II, OH
Dovey's Roost Farms, MI
East Fork Growers, IN
Forch Farms, MI
G & E Farms, IN
Gary Hanson Farms, MN
Gelfius Farms, IN
Haas Farms, L.L.C., OH
Hartung Brothers Farms, WI
Huebert Farms, MN
Hurley Farms, OH
Iott Farms, Inc., MI
Iott Ranch & Orchard, MI
Ingomar Packing, CA
Janssen Brother Farms, MI
Jeff Bell Farms, MN
Jeff Stevens Farms, MI
Jody L. Herr Farms, IN
Keesling Farms, IN
King Farms, IN
Knick Farms, OH
Kurtz Farms, Inc., OH
Los Gatos Tomato, CA
LuEllen Farms, Inc., IN
M&A Produce Farms, MI
McDonnall Farms, OH
Metzger Farm, OH
Middlesworth Farms, IN
Mobley Greenhouses, GA
Morrin Farms, Inc., MI
Niese & Maag Farm, OH
Paarlberg Farms, IN
Plank Farms, IN
Planson Farms, Inc., OH
Paul Platz Farms, MN
Razorback Farms, AR
Red Ripe, IN
Rice Farms, IN
R.L. Jeffres & Sons, NY
Rohrs Brothers Farm, OH
Rosenbaum Farms, IN
Schneider Farms, WI
Shafel Farms, WI
State Line Farms, OH

Tribond Farms, Inc., IN
Utterback Farms, IN
Veazey Plant Company, GA
Waschbisch Bros., Inc., WI
William Pueschel Farm, MI
Wischmeyer Farms, OH
Wittmer Farms, IN